

Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes.

In reviewing this NPRM, several concerns about new STC's are raised. Under the **Background** – *Synopsis of the proposal* portion of this proposal it states “*The new limits will apply to new type certificates (TC's) and Supplemental Type Certificates (STC's) for which application is made after November 4, 2004*”. This statement has potential to subject future STC applicants to unnecessary noise testing resulting in higher development costs and even possible denial of STC.

Older certified aircraft have engine/propeller/exhaust combinations would not pass this new level of noise testing. Requiring STC applicants to meet more strict noise level testing then was required for the initial aircraft certification seems unreasonable. A person applying for an STC for extended baggage or some other modification not effecting current engine/propeller/exhaust combination, should not be required to undergo noise level testing. Under this rule it would appear that now this applicant will have to certify his modified aircraft to the new noise level requirement, when his actual modification had no effect in the increase or decrease of the noise levels produced by the aircraft.

An STC applicant who wishes to use a different engine/propeller/exhaust combination to take advantage of new, safer, and more efficient technologies would be held to stricter noise level requirements then those of the original certification. This would generate extra costs for noise testing and development of these modifications. These extra costs incurred will discourage pursuing such technologies, resulting in a lack of solutions to improve/enhance safety in these older aircraft. STC applicants should only be required to meet the noise requirements that were in place for the initial aircraft certification.